



RAYMOND J. CARTA

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>10/01/2024</u>

1055 Washington Boulevard
Stamford, CT 06901-2249
Main (203) 462-7500
Fax (203) 462-7599
rcarta@rc.com
Direct (203) 462-7530

Also admitted in New Jersey,
New York and Pennsylvania

September 30, 2024

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.

10/01/2024

Re: *Sonia Zurita v. First Unum Life Insurance Company*
Case No.: 1:24-cv-04196 (PAE)

Dear Judge Parker:

This office represents the Defendant, First Unum Life Insurance Company (“First Unum”), in the above referenced matter. First Unum and the Plaintiff, Sonia Zurita (“Plaintiff”) (collectively, the “Parties”), write to respectfully request that the telephonic conference scheduled for October 9, 2024 with Your Honor be adjourned until such time as the Parties are prepared to schedule a settlement conference (Dkt. No. 24). While the Parties are grateful for Your Honor’s time, we are not ready for a settlement conference currently.

As described by Judge Paul A. Engelmayer at the September 18, 2024 pretrial conference, the Parties understood that once the Parties agreed “that a conference would be useful,” Plaintiff would “contact the Magistrate Judge’s chambers to schedule a settlement conference.” (Dkt. No. 23). As such, they agreed to the referral to Your Honor. However, as discovery is ongoing, the Parties do not believe that a telephonic conference would be useful at this time. Specifically, First Unum is still responding to Plaintiff’s interrogatories, requests for production, and requests for admission. Further, Plaintiff has only recently received the Administrative Record and is still in the process of reviewing it. As such, the Parties request that the October 9, 2024 telephonic conference with Your Honor be adjourned until such time as the Parties are prepared to schedule a settlement conference.

Hon. Katharine H. Parker, U.S.D.J.
September 30, 2024
Page 2

Thank you for your consideration of this matter.

Respectfully submitted,



Raymond J. Carta

cc: All Counsel of Record (*via* ECF)